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-- Appelberg discloses a continuous deposition process to put down a mono-layer of phosphor on a continuous film of organic binder coated ITO/PET. Applicants submit there is NO non-continuous process that will produce an equivalent deposition to this process. Thus Kardon would need to utilize a continuous process for processing his front electrode. This would include a continuous coating process for the first organic adhesive layer and a continuous euring/drying method for the first adhesive layer after the phosphor deposition. Kardon does not teach, disclose or suggest such a continuous process. --

-- Kardon's organic adhesive layer cannot be used in the Appelberg disclosed continuous process because the organic adhesive layer is incompatible with Appelberg's process. Appelberg discloses a UV curable organic layer which is coated wet at 100% solids onto the ITO surface of the ITO coated PET. The mono-layer of phosphor is deposited onto the wet coat before curing. Kardon's chemistry for both his coatings is mixed in a slurry with solvent and reacted and dried (Column 5, lines 52, 59) and results in his phosphor and barium titanate layers being dry before lamination in his process. This is incompatible, however, with Appelberg's continuous coating of 100% solids wet organic binder because Kardon's chemistry is only wet in a solvent system. Many solvents, including those listed by Kardon, are highly flammable and strictly forbidden from being used in an electrostatic deposition system with high voltages and the high possibility of arcing and resulting fire. Therefore, one could not deposit a mono-layer of phosphor onto a wet layer of Kardon's disclosed organic binder mixed with solvent. If, however, one tried to put down a wet layer of Kardon's chemistry and remove the solvents by drying before entering the electrostatic chamber, the organic layer would be dry as disclosed by Kardon and the phosphor particles would not attach themselves, falling away immediately. --

Kindly make these changes of record in the application file.

If there are any questions, please contact the undersigned.

Very truly yours,

Yack M. Pasquale

Registration No. 31,052

Attorney for Applicants

JMP/jg